IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

CRIM NO. 22-342 (RAM)

JULIO M. HERRERA-VELUTINI,

Defendant.

MOTION TO RESTRICT

TO THE HONORABLE COURT:

COMES NOW, defendant Julio M. Herrera-Velutini (Mr. Herrera), through the undersigned attorneys, and very respectfully states and prays as follows:

Today, Mr. Herrera will be filing a Motion in response to a restricted order issued at Docket No. 534. Mr. Herrera respectfully requests that the Motion be accepted by the Court for filing with the same level of restriction: *Selected Parties Restricted Viewing*. The protection of the information detailed therein, outweighs the presumption of public access.

WHEREFORE, it is respectfully requested that the Motion be accepted under the requested restriction level.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 4th day of June, 2024.

DLA Piper (Puerto Rico) LLC

/s/ Sonia I. Torres-Pabon Sonia I. Torres-Pabon (USDC-PR No. 209310) sonia.torres@us.dlapiper.com 500 Calle de la Tanca, Ste. 401 San Juan, PR 00901-1969 Tel: 787-281-8100

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CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that on this same date we electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

> /s/ Sonia I. Torres-Pabón SONIA I. TORRES-PABÓN